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Attorneys for Secured Creditor and Movant  
Deutsche Bank National Trust Company, as  
Trustee for FFMLT Trust 2006-FF3, Mortgage  
Pass-Through Certificates, Series 2006-FF3

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA—SACRAMENTO DIVISION

In re:  
Salvatore Crivello and Emma Jane Crivello,  
Debtors.

Deutsche Bank National Trust Company, as  
Trustee for FFMLT Trust 2006-FF3,  
Mortgage Pass-Through Certificates, Series  
2006-FF3,

Movant,

-vs-

Salvatore Crivello and Emma Jane Crivello,  
Debtors; Michael P. Dacquisto, Chapter 7  
Trustee; Lisa Gentry

Respondents.

Case No: 19-21017

Chapter 7

DC No.: DJD-001

**MOTION FOR RELIEF FROM  
AUTOMATIC STAY**

Date: 04/10/19  
Time: 10:00 a.m.  
Ctrm: 34  
Dept: D

*The courtroom of the Honorable Robert S.  
Bardwil*

Secured Creditor and Moving Party Deutsche Bank National Trust Company, as Trustee  
for FFMLT Trust 2006-FF3, Mortgage Pass-Through Certificates, Series 2006-FF3 (“Creditor”),  
respectfully submits its Motion for Relief from Automatic Stay to enforce its lien upon the  
personal property of Debtors Salvatore Crivello and Emma Jane Crivello (“Debtors”).

1. On February 21, 2019, Debtors filed a voluntary Chapter 7 petition.

2. Michael P. Dacquisto is the duly qualified and acting Chapter 7 Trustee.

3. On November 22, 2005, Debtor Salvatore Crivello ("Borrower"), for valuable consideration, made, executed, and delivered to First Franklin a written Adjustable Rate Note ("Note"). Pursuant to the terms of the Note, Borrower promised to repay the amount of \$936,000.00 at an initial annual interest rate of 6.75% in three hundred and sixty (360) monthly payments commencing on January 1, 2006, and continuing thereafter until December 1, 2035, at which time all amounts due and owing under the Note are to be paid in full.

4. As security for the Note and as part of the same transaction, Borrower made, executed, and delivered to First Franklin a Deed of Trust granting First Franklin beneficial interest in the real property commonly known as 29805 Rustic Oak, Laguna Niguel, CA 92677 ("Property"). The Deed of Trust was duly recorded in the County Recorder's Office of Orange County, California. The Note and Deed of Trust have been duly assigned to Creditor.

5. Debtors have defaulted in the payments due under the Note and Deed of Trust by failing to make the monthly payment due July 1, 2018, and all payments due thereafter. Arrears now exist in the amount of \$31,026.30 representing eight (8) payments, fees, and costs. An additional payment is due on March 1, 2019, in the amount of \$3,670.61. Arrears are as follows:

7/1/18 payment	\$3,777.75
8/1/18 payment	\$3,777.75
9/1/18 payment	\$3,777.75
10/1/18 payment	\$3,670.61
11/1/18 payment	\$3,670.61
12/1/18 payment	\$3,670.61
1/1/19 payment	\$3,670.61
2/1/19 payment	\$3,670.61
Attorneys' fees	\$1,125.00
Inspection fee	\$ 90.00
Payoff Statement fee	<u>\$ 125.00</u>
Total Arrearages	\$31,026.30

9. Debtors have indicated an intent to surrender the Property in their Statement of Intention.

A. For an Order granting Creditor immediate relief from the automatic stay to take any and all actions, including, but not limited to, foreclosure and sale, to enforce its lien

on the real property commonly known as 29805 Rustic Oak, Laguna Niguel, CA  
92677;

B. That the requirements of Bankruptcy Rule 4001(a)(3), be waived; and

C. That Creditor have such other and further relief as the Court may deem just and  
proper.

Dated: March 7, 2019

Respectfully submitted,

/s/Darren J. Devlin

Darren J. Devlin, Esq.

Attorney for Secured Creditor and Movant  
Deutsche Bank National Trust Company, as  
Trustee for FFMLT Trust 2006-FF3,  
Mortgage Pass-Through Certificates, Series  
2006-FF3